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PATENT APPLICATION

ATTORNEY DOCKET NO. 10007591-1

IN THE  
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Srikanth Natarajan et al.

Confirmation No.: 9191

Application No.: 09/838,239

Examiner: Peling Andy Shaw

Filing Date: April 20, 2001

Group Art Unit: 2144

Title: METHOD AND SYSTEM FOR CONSOLIDATING NETWORK TOPOLOGY IN DUPLICATE IP NETWORKS

Mail Stop Appeal Brief - Patents  
Commissioner For Patents  
PO Box 1450  
Alexandria, VA 22313-1450

TRANSMITTAL OF REPLY BRIEF

Transmitted herewith is the Reply Brief with respect to the Examiner's Answer mailed on October 18, 2007.

This Reply Brief is being filed pursuant to 37 CFR 1.193(b) within two months of the date of the Examiner's Answer.

(Note: Extensions of time are not allowed under 37 CFR 1.136(a))

(Note: Failure to file a Reply Brief will result in dismissal of the Appeal as to the claims made subject to an expressly stated new ground rejection.)

No fee is required for filing of this Reply Brief.

If any fees are required please charge Deposit Account 08-2025.

Date: December 17, 2007

I hereby certify that this document is being filed by personal delivery to the Customer Service Window Randolph Building, 401 Dulany Street Alexandria, VA 22314, of the United States Patent & Trademark Office on the date indicated above.

By: [Signature] 48,360  
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Respectfully submitted,  
Srikanth Natarajan et al.

By

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent Application of	)	<b>MAIL STOP Appeal Brief - Patents</b>
Srikanth Natarajan et al.	)	
Application No.: 09/838,239	)	Group Art Unit: 2144
Filed: April 20, 2001	)	Examiner: Peling Andy Shaw
For: METHOD AND SYSTEM FOR	)	Confirmation No.: 9191
CONSOLIDATING NETWORK	)	
TOPOLOGY IN DUPLICATE IP	)	
NETWORKS	)	

**REPLY BRIEF**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Examiner's Answer mailed 18 October 2007 and in addition to the arguments presented in the previously filed Appeal Brief, Applicants note that in the Examiner's Answer, the Examiner relies on column 7, lines 5-19 of U.S. Patent No. 5,577,252 to Nelson et al. to assert that "Nelson has cited two methods for implementing 'trust' name resolution." Appellants respectfully disagree with the Examiner's ultimate conclusion.

Specifically, on page 10 of the Examiner's Answer, the Examiner relies on column 7, lines 5-11 of the Nelson et al. patent to assert that "One of them is using special connection." However, the passage in column 7, lines 5-8 of the Nelson patent merely recites that the first way of allowing a name resolution to cross name server boundaries is to set up a special connection where two name servers trust each other. Further, the disclosure in column 7, lines 7-9 of the Nelson patent appears to teach away from a hostname resolution based on a trust flag: "When two

name servers trust each other, no authentication is required when performing a name resolution that crosses the name server boundary."

On page 10 of the Examiner's Answer, the Examiner appears to rely on column 6, line 62 through column 7, line 18 of the Nelson et al. patent to assert that "The other is the encapsulation as discussed above." However, the passage in column 7, lines 13-15 of the Nelson patent recites that the second way of allowing a name server to continue across a name server boundary is to have the original context and the context in the second name server have the same encapsulated principal. As disclosed in the Nelson et al. patent, the encapsulated principal appears to relate to the original context and the context in the second name server having the same encapsulated principal, but this would not have taught or suggested Appellants' information from a collection computer that includes a management domain identifier and a trust flag to indicate a binary setting, as Appellants have claimed.

Further, in column 7, lines 22-27, the Nelson et al. patent recites that "If context D has the same encapsulated principal as context K, the name resolution will be allowed to cross the name server boundary and complete the name resolution. After completing the resolution, name server B will return a copy of object X that has the same encapsulated principal as context D." Accordingly, the "encapsulated principal," as the Examiner relies on, does not appear to be used as a trust flag for the purpose of deciding whether a management computer should resolve a hostname, but rather, the "encapsulated principal" as referred to in the Nelson et al. patent seems to be for a name server "B" to return a copy of object "X" that is found to have the same "encapsulated principal."

Based on these citations relied upon by the Examiner, the Nelson et al. patent, individually or in respective combinations with other applied references, would not have taught or suggested at least, among other claimed features, receiving, in at least one management computer, information from the at least one collection computer that includes the management domain identifier and a trust flag to indicate a binary setting; and deciding whether the at least one management computer should resolve a hostname being reported by the at least one collection computer based on the binary setting of the trust flag, as recited in Appellants' claim 1. Likewise, the Nelson et al. patent, individually or in respective combinations with other applied references, would not have taught or suggested at least, among other claimed features, at least one management computer for receiving information, from the plurality of collection computers, that includes the management domain identifier and a trust flag to indicate a binary setting, the at least one management computer being capable of deciding whether to resolve a hostname in the information being reported by the collection computers based on the binary setting of the trust flag, as recited in claim 8.

For at least this reason, in addition to Applicants' arguments previously presented, the Examiner has failed to establish a prima facie case of obviousness in combining the Lecheler et al. publication and the Nelson et al. patent, and in combining the Pulsipher et al. patent and the Nelson et al. patent, to variously reject independent claims 1 and 8, and dependent claims 2-7.

Respectfully submitted,

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Date: December 17, 2007

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